

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Joshua Winer,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION FILE
)	NO. 1:25-CV-02329-TWT
)	
Umaymah Mohammad, AJP Educational)	
Foundation, Inc. A/K/A American Muslims)	
For Palestine, WESPAC Foundation, Inc.,)	
Sean Eren as the representative of National)	
Students for Justice in Palestine, Doctors)	
Against Genocide Society, Cair-Nga Inc.)	
A/K/A CAIR-Georgia, CAIR Foundation)	
Inc., A/K/A Council on Islamic Relations or)	
CAIR, Rupa Marya, Ibrahim Jouja as)	
representative of Emory Students for Justice)	
in Palestine,)	
)	
Defendants.)	

**DEFENDANT CAIR-FOUNDATION, INC.’S MOTION TO DISMISS AND
MOTION FOR ATTORNEY’S FEES**

COMES NOW Defendant, CAIR-Foundation, Inc. (“CAIR-Foundation”), by and through the undersigned counsel, and hereby files its Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6), seeking dismissal of Plaintiff’s Amended Complaint against CAIR-Foundation for failure to state a claim upon which relief can be granted.¹ Pursuant to O.C.G.A. § 9-11-11.1(b), CAIR-

¹ Plaintiff’s Amended Complaint misidentifies CAIR-Foundation, Inc. as “CAIR Foundation, Inc.”

Foundation respectfully requests this Court award CAIR-Foundation its attorney's fees and litigation expenses in connection with this matter. In support of this Motion, CAIR-Foundation relies upon its Brief in Support of Motion to Dismiss and Motion for Attorney's Fees and all pleadings. CAIR-Foundation respectfully requests that its Motion be GRANTED and that Plaintiff's Amended Complaint against CAIR-Foundation be dismissed with prejudice and that this Court award CAIR-Foundation its attorney's fees and litigation expenses in connection with this matter.

Respectfully submitted this 22nd day of July, 2025.

SWIFT, CURRIE, McGHEE & HIERS

By: /s/ Kori E. Wagner
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LOCAL RULE 5.1(C) CERTIFICATION

By signature below, counsel certifies that the foregoing pleading was prepared in Times New Roman, 14-point font in compliance with Local Rule 5.1(C).

SWIFT, CURRIE, McGHEE & HIERS

By: /s/ Kori E. Wagner

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing **DEFENDANT CAIR-FOUNDATION, INC.'S MOTION TO DISMISS AND MOTION FOR ATTORNEY'S FEES** with the Clerk of Court using the CM/ECF System which will notify counsel of record as follows:

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I further certify that I have this day served the foregoing **DEFENDANT CAIR-FOUNDATION, INC.'S MOTION TO DISMISS** via U.S. Mail upon the following parties:

Defendant Umaymah Mohammed
c/o Jonathan Wallace
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Defendant Rupa Marya
c/o Jonathan Wallace
P.O. Box #728
Amagansett, NY 11930

Defendant AJP Educational
Foundation, Inc.
c/o Registered Agent Osama Abu
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Defendant Sean Eren as Representative
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710 Riverside Drive, Apt. 2C
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Defendant Ibrahim Jouja as
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6301 Glen Hill Road
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Defendant Doctors Against Genocide
Society
c/o Registered Agent Nidal Jboor
25614 Ford Road
Dearborn Heights, MI 48127

Defendant WESPAC Foundation, Inc.
77 Tarrytown Road, Suite 2W
White Plains, NY 10607

This 22nd day of July, 2025.

SWIFT, CURRIE, McGHEE & HIERS

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